DISTRIBUTED WIND ENERGY ASSOCIATION

our Wind our Power our Future

June 2, 2011

Carla Peterman, Presiding Commissioner
James Boyd, Associate Commissioner
Renewables Committee
California Energy Commission
1516 Ninth St.
Sacramento, CA 95814-5512

Dear Commissioners Peterman and Boyd:

The Distributed Wind Energy Association (DWEA) is a relatively new national trade association comprised of manufacturers, distributors, project developers, dealers, installers, and advocates, whose primary mission is to promote and foster all aspects of the distributed wind energy industry. We define distributed wind as being behind-the-meter generation, whether it's with a 5 kW residential turbine or a 1.5 MW turbine at a water treatment facility.

Since the February 8, 2010 communication from representatives of the wind energy to Commissioner Douglas (attached) DWEA has engaged with the California Energy Commission (CEC) in an effort to revise and strengthen the Emerging Renewables Program (ERP) for small wind. We have submitted letters and testimony and have met with you and other Commissioners and advisors to propose changes to the ERP Guidebook that would modify the eligibility criteria for the current rebate structure.

The suspension of the ERP program was necessary and was supported by DWEA, but the elimination of all incentives over the past two months has effectively brought new small-scale wind sales and installations to a grinding halt. Unless the program is restarted very soon with the necessary modifications to ensure efficacy and equity, California's small wind industry may end.

Since the April 14, 2011 staff workshop on the proposed changes to the ERP, DWEA has not received any communication from the CEC on recommended changes or feedback on our proposals. Neither have we been informed of future workshops or stakeholder meetings or CEC action on this matter.

In response to specific questions that came out of the recent meetings between you, and CEC advisors and our representative Justin Malan, we are submitting the following additional recommendations on eligibility criteria, power curves and rebates which supplement the formal submission on EPR revisions submitted by DWEA on April 21. 2011.

**Eligibility:**

a. Eliminate the existing eligible turbine list

b. Through the end of this year adopt a list of field proven turbines up to 30 kW and allow additions if they are certified to the AWEA, BWEA, or IEC standards or meet the "provisional eligibility" criteria outlined in DWEA's testimony. The "grandfathered" list would be:

- Southwest Windpower Skystream 3.7 (2.4 kW), Whisper 100 (0.9 kW), Whisper 200 (1 kW), and Whisper 500 (3 kW)
- Proven Energy 7 (2.5 kW), 11 (6 kW), and 35 (15 kW)
- Bergey Windpower Excel (10 kW) and XL.1 (1 kW)
- Endurance S-343 (5 kW)
- Xzeres 110 (2.5 kW) and 442 (10 kW)
- Ventera 10 (10 kW)
- Evance R9000 (5 kW)
- Fortis Montana (5 kW)
- Eoltec Sirocco (5 kW)
- Gaia 133-11 (11 kW)
- WTIC 31-20 (20 kW)
- Kestrel e300i (2 kW?) and e400i (3 kW?)

(Note: A number of these companies are not members of DWEA)

Alternatively, the CEC could adopt the eligible turbine list of the Energy Trust of Oregon, which we have confidence in, but which leaves off a few models we have suggested as proven in the field.

c. For Jan. 1 – July 31, 2012 (assuming the program continues), use the criteria outlined in our April 14th testimony, with provisional eligibility allowed.

d. After July 31, 2012 only fully certified turbines are eligible.

**Power Curves:**

a. CEC would require submission of 3rd party power curves when available and manufacturer's field tested power curves when they are not. In addition an efficiency curve (Cp) would be required and this will show whether the claims are realistic. Any Cp points above 35% would be suspicious (Note: DyoCore hits 275%).

**Rebates:**

a. The existing structure would be offered for 5 weeks, which would complete the 12 month commitment in the Guidebook.

b. After that the CEC would duplicate the LIPA structure (see http://www.dsireusa.org/incentives/incentive.cfm?Incentive_Code=NY55F&re=1&ee=1 ) except that the 2nd payment would be 20% rather than 35%. The LIPA program is performance based, has a 60% cap, and pays part of the subsidy after one year based on actual performance. The performance prediction would be based on wind maps from the CEC, 3Tier, or AWS Truepower.

The CEC ERP program, which was the first state system benefit charge (CTC in California) funded solar and wind rebate program in the nation, has created the largest single small wind dealership in America and has the potential to create hundreds of new jobs in California over the next few years. It is imperative to restart the program with these necessary revisions without further delay.

Please do not hesitate to contact me at (928) 255 -0214 or jjenkins@distributedwind.org or our advocate in Sacramento, Justin Malan with Ecoconsult at (916) 448-1015 or justin@ecoconsult.biz with any questions.

Sincerely,

JJenkins

Jennifer Jenkins

Executive Director

Cc: Senator Lois Wolk

Senator Sam Blakeslee